

The Basics of Federal Grants Management

NHHS Hours 1 and 2
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Presenter

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Types of Federal Awards and Why That's Important

- Federal Acquisition vs. Federal Assistance
- Federal Contracts vs. Federal Grants and Cooperative Agreements
- Subawards
 - Subcontracts
 - Subgrants
 - Contracts Under Grants

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Types of Federal Awards and Why That's Important

- Block Grants vs. Categorical Grants
- Mandatory Grants vs. Discretionary Grants
- Formula Grants vs. Project Grants
- Earmarked Grants

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The Federal Award Process

- Pre-award
- Post-award
- After-the Grant

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Pre-award Activities

- Solicitation
 - RFA's, NOFA's, PA's
- Application
 - SF 424 Series
- Awarding Agency Review
 - Programmatic, Cost, Organizational
- Award
 - Funding, Time for Performance, Requirements

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Post-Award Activities

- Incurrence of Cost
- Payment
- Disbursement of Cash
- Documentation of Transactions
- Reporting
 - Financial
 - Performance

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After-the-Grant Activities

- Close-out
- Continuing Accountability

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Not Necessarily “After the Grant”

- Audit and Audit Resolution
 - Non-federal Audit
 - Single Audit Act and OMB Circular A-133
 - Based on grantee or subgrantee fiscal year
- Federal Audit
 - Inspectors General
 - Government Accountability Office (GAO)

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Sources of Authority

- Federal Laws
 - Authorization Statutes
 - Annual Appropriations Statutes
 - “Cross Cutting” Statutes

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Sources of Authority

- Governmentwide Directives
 - Presidential Executive Orders (Example: EO 12549)
 - Office of Management and Budget Circulars
 - Department of Treasury Regulations and Circulars

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OMB Circulars

	Administrative	Cost	Audit
Governments	A-102	A-87	A-133
Colleges and Universities	A-110	A-21	A-133
Nonprofit Organizations	A-110	A-122	A-133

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Sources of Authority

- Regulations
 - Administrative Procedure Act
 - Federal Register
 - Code of Federal Regulations
 - US Department of Health and Human Services
 - 45 CFR 92
 - 45 CFR 74
 - 45 CFR 96

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Sources of Authority

- Grant and Subgrant Agreements
 - Obligation of Funds
 - Performance Period
 - Applicable Requirements

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What Grants Management Tools Do You Need?

- OMB Circular A-102 Common Rule
 - HHS Implementation: 45 CFR 92
- HHS Block Grant Regulations 45 CFR 96
- OMB Circular A-87
- OMB Circular A-133
- Standard Form 424 Series
- Standard Forms 269 and 269A
- Standard Forms 272 and 272A
- A Guide for State and Local Government (OASMB C-10) (HHS, Program Support Center)

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Key Websites

- www.whitehouse.gov
- www.usa.gov
- www.access.gpo.gov
- www.ignet.gov
- www.gao.gov

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Post-Award Requirements

- System Standards
 - Financial Management
 - Procurement (Purchasing)
 - Property Management

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Financial Management Standards

- Financial Reporting
- Accounting Records
- Internal Control
- Budgetary Control
- Allowable Cost Procedures
- Source Documentation
- Cash Management Procedures

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Procurement Standards

- States--State Law and Procedure
- Other Governmental Grantees and Subgrantees
- Code of Conduct
- Acquisition Planning
- Solicitation of the Marketplace
- Competition
- Source Evaluation and Selection
- Contract Award
- Contract Administration

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Property Management Standards

- Types of Property
 - Real Property
 - Equipment
 - Supplies
 - Intangible Property
- Property Management Standards for Equipment
 - Records
 - Inventory
 - Control Procedures
 - Maintenance
 - Disposition

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Limitations on Awards

- Cost Allowability
- Matching and Cost Sharing
- Program Income
- Changes
- Period of Performance

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Matching and Cost Sharing

- How to meet the requirement for a non-federal share, *when one exists*
- Non-federal sources
- Cash expenditure
- Third party, in-kind contributions
- How to value third party, in-kind contributions

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Program Income

- Income earned as a *direct* result of grant-funded activity
- Options for use
 - Deduction
 - Matching
 - Addition
- * Timing of expenditure— “First in; first out”

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Changes

- Programmatic
- Budgetary
- Cost
- Definition of “prior approval”

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Performance Period

- Obligation of funds
- Liquidation of obligations
- Pre-award costs

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Reporting and Monitoring

- Financial
 - Obligations
 - Cash management
- Performance
 - Routine
 - Extraordinary
- Monitoring
 - By awarding agency
 - By recipient or subrecipient

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Records Access and Retention

- What records have to be kept?
- By whom?
- For how long?
- When does the record retention period start?
- Who has access to the records?

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Enforcement

- Remedies for Grantor Agencies
 - "Cure" notice
 - Special conditions ("high risk" status)
 - Disallowance of cost
 - Suspension of award
 - Termination of award
 - Debarment of organization or individual

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Close-out

- Final reporting
 - Financial
 - Performance
 - Property
- Settlement of funds
- *Not affected by close-out:*
 - Records
 - Property
 - Audit rights
 - Dispute procedures

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